



Gulf Coast Aeronautical Services

A Gulf Coast Based, Worldwide Aviation Training Solution

August 20th, 2021

**Federal Aviation Administration
Office of Rulemaking
Attn: Rule Making Committee
800 Independence Avenue, SW Room 810
Washington, DC 20591**

REF: Exemption from 14CFR§61.156(a)

Dear Rule Making Committee:

14 CFR§11.63

Gulf Coast Aeronautical Services LLC, 14CFR§142 Air Agency# 1GUX090K, is requesting an exemption from 14 CFR Part 61.156 (a), AC 61-138 change 1, and the Final Rule Notice (FRN) for Pilot Certification and Qualification Requirements for Air Carrier Operations for the "Classroom" and "Classroom Setting."

14 CFR§11.81(a):

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14 CFR§11.81(b):

Gulf Coast Aeronautical Services LLC is seeking relief from the ambiguous language regarding the word "classroom" in 14 CFR §61.156 and the preamble to that rule that uses "classroom setting" and any other "common use interpretation" of "classroom" and "classroom setting." Specifically, Gulf Coast Aeronautical would like to continue to apply video and communication technology (VCT) to teach the academic portion of the Airline Transport Pilot Certification program. Which is currently approved under Training Specification A304 and relief provided through the 142 CMO remote virtual ground training due to the ongoing COVID-19 pandemic.

The requirement for academic training in a physical classroom is not defined in 14 CFR§1, nor is the definition of "classroom" when referencing academic training. After reviewing the public records, the word "classroom" was contained in the preamble to the FRN Pilot Certification and Qualification Requirements for Air Carrier Operations that created the ATP CTP. Gulf Coast Aeronautical Services believes the word's "classroom setting" is intended to prevent asynchronous learning to meet the former requirements of the Airline Transport Pilot Practical Test Standards knowledge exam only. ATP knowledge required only rote memorization followed by a practical test and did not fill the knowledge gaps identified in early rulemaking.

Gulf Coast Aeronautical Services also believes that the word(s) "classroom" and "classroom setting" are anachronous by today's definitions with video teleconferencing technologies used by higher education, the Department of Defense, and even the FAA itself.

14 CFR§11.81(C):

Gulf Coast Aeronautical was one of the first Training Centers approved by the 142 CMO for the virtual ground training remote site (Exhibit 1). We used FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B for compliance as a templet for interim guidance with the goal of long-term acceptance of the ATP CTP specialty curriculum and eventually our core curriculum under the same guidance. We believe this guidance applies to all curricula under the provisions of §142.

Gulf Coast Aeronautical Services believes the guidance provided in Exhibit 1 provides the framework required for additional guidance to continue virtual ground schools under FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B

In a separate document (Exhibit 2), we have laid out a compliance statement document on how we meet the requirements listed in FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B, which would apply to any core or specialty curriculum identified under §142 using synchronous VCT methods.

14 CFR§11.81(d):

Gulf Coast Aeronautical Services believes any further restrictions of delivery methods of the Airline Transport Pilot Certification Training Program (ATP CTP) will further limit the throughput of commercial pilots to Air Carrier operations. We have included Air Carrier Pilot shortage studies (Exhibit 3) pre and post COVID-19.

We believe this exemption would improve access to all pilots to meet the requirements of 14CFR§61.156. This exemption would directly affect our US Military and DoD civilian personnel assigned overseas with limited available time to comply with §61.156 combined with an ATP-Type Rating training program.

Note: As a current provider of the Virtual Remote Classroom of ATP CTP training, we find in most cases with our military clients, the training footprint can be limited command directives or COVID-19 quarantines. This exemption directly impacts improving access to ATP training and testing for servicemembers.

14 CFR§11.81(e):

The Administration currently authorizes both core and specialty curricula training under FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B, using both asynchronous (Computer Based Training) and synchronous (Instructor lead VCT) training. If this protocol is followed along with the current 142 CMO additional guidance, we believe the quality of the ATP CTP course can be maintained. It will also improve the FAA oversight capabilities. The Aviation Safety Inspector may attend a live session while teleworking or request recorded sessions of an individual module or element of the academic program. Safety and oversight are enhanced in this case.

Online academic learning and materials have been in use by major universities for years and have made significant strides in innovative teaching when coupled with modern technology. Professionals of all disciplines, doctors, nurses, and pilots, receive training and maintain certification using online learning. Using VCT software has become commonplace, specifically during the COVID-19 pandemic, and allows for a level of interaction between student and instructor very similar to physical classrooms. We believe that the academic requirements of AC61-138 and §61.156 meet the knowledge and cognitive skill objectives, and there is no effect on safety.

As for §§61 & 141, most FAA-approved ground schools, from the private pilot through Certified Flight Instructors (CFI) are online and don't have real-time instructor interaction. The FAA also allows instructors to retain CFI currency by accomplishing an electronic flight instructor refresher course (eFIRC) with no instructor interaction. A flight instructor, after initial certification, might never interact with the FAA nor another instructor again formally. During the COVID-19 pandemic, the FAA adopted VCT use for Designated Pilot Examiner (DPE) training and DPE currency requirements. The FAA uses VCT technology to conduct internal examiner (DPE, SAE, TCE) initial and recurrent training. The FAA has even used VCT and GoPro cameras to monitor FAA practical tests given by examiners. We believe that the ATP CTP course is just the first phase of a multi-phase process to certify an airman under the current ATP Airman Certification Standards. Since our proposed deviation still has an ATP CTP Certified instructor (in real-time) presenting approved multimedia under training specification A304, there is no adverse effect on safety.

Since our initial certification under Training Specification A504 & A304, we have kept a database on the end-of-course results in our Learning Management system. We have conducted virtual remote ATP CTP classes beginning in April 2020 with initial approval from the 142 CMO. There is no difference in the aggregate scores of traditional classrooms versus Virtual Classrooms. We maintain that the quality of both delivery systems is preserved, and the data shows no learning and knowledge recall deficits.

14 CFR§11.81(f):

Gulf Coast Aeronautical Services also believes that the word(s) "classroom" and "classroom setting" are anachronous by today's definitions with video teleconferencing technologies used by higher education, the Department of Defense, and even the FAA itself. We seek relief from any FAA interpretation of the words "Classroom" or "Classroom Setting" as it is not currently defined in 14CFR§1. Gulf Coast Aeronautical believes the current guidance in FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B provides accurate guidance to the TCPM and the Training Center on approval and acceptance of distance learning programs, quality control measures, and safety management concerns. Gulf Coast Aeronautical has demonstrated over the last 16 months that Virtual Remote Ground School has been delivered in a safe and effective manner.

14 CFR§11.81(g):

Gulf Coast Aeronautical Services has attached several Exhibits for background, research, and reference documents.

14 CFR§11.81(h)

Not required, as Gulf Coast Aeronautical Services will not operate outside the United States.

Best Regards,



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